

### 3.7 RELATIONSHIP TO PLANS AND POLICIES

This section evaluates the relationship of the Proposed Actions, including the proposed Master Plan, Sensitive Area Master Plan for the site, and potential impacts associated with development assumed under the alternatives, with applicable and adopted land use plans, policies, and regulations. A summary of the key elements of each plan, policy, or regulation is provided, followed by an analysis of consistency.

#### State of Washington Plans and Policies

##### **Growth Management Act**

The Growth Management Act (GMA) (RCW 36.70A), adopted in 1990 and subsequently amended, provides a comprehensive framework for managing growth and coordinating land use planning with the provision of infrastructure. The general goals of the GMA include, in part: directing growth to urban areas; reducing sprawl; encouraging economic development consistent with adopted comprehensive plans; protecting private property rights; providing efficient multi-modal transportation systems; encouraging a variety of housing types and densities affordable to all economic segments of the population; protecting the environment; and ensuring that public facilities and services necessary to support development meet locally established minimum standards at the time development is in place (RCW 36.70A.020).

Counties must designate urban growth areas (UGA) as areas within which urban growth and densities are permitted and public services and facilities are available and/or planned to be available (RCW 36.70A.110). Within designated UGAs, residential and employment densities are to be sufficient to accommodate 20-year forecasts.

Jurisdictions subject to GMA must prepare and adopt: countywide planning policies; comprehensive plans containing policies with specific elements for land use, transportation, housing, capital facilities, utilities, rural lands, and economic development; and development regulations implementing those plans. Jurisdictions subject to GMA must also have regulations governing the use of environmentally sensitive areas. The GMA also authorizes the imposition of impact fees for specified public services and facilities, including roads, schools, parks and recreation facilities, and fire protection facilities.

##### *Consistency Discussion*

Consistent with the GMA and Countywide Planning Policies (described below), the City of Tukwila has adopted a Comprehensive Plan to guide future development and fulfill the City's responsibilities under GMA. The Proposed Actions, as identified in Chapter 2, Description of Proposed Action and Alternatives, are intended to encourage future growth within the UGA of the City of Tukwila, and are consistent with the GMA goals and policies outlined above. The relationship of the Proposed Actions to the Tukwila Comprehensive Plan is discussed in greater detail below, under City of Tukwila Plans and Policies.

##### **Shoreline Management Act**

The Shoreline Management Act (SMA) of 1971 (RCW 90.58) is intended to protect the public interest associated with shorelines of the state while, at the same time, recognizing and

protecting private property rights consistent with the public interest. The primary implementing tool of the SMA is the adoption by local jurisdictions of Shoreline Master Plans, which must also be approved by the Department of Ecology. The SMA establishes two basic categories of shoreline: “Shoreline of State-wide Significance,” which are identified in the SMA; and “shorelines,” which includes all of the water areas of the state and their associated wetlands, together with the lands underlying them. The Green River shoreline is classified as a “Shoreline of State-wide Significance” based on its mean annual flow (RCW 90.58.030).

The Proposed Actions include amending Tukwila’s Shoreline Master Plan (SMP) to apply Tukwila’s “Urban Environment” designation to the portion of the site proposed for annexation (see City of Tukwila Comprehensive Plan, Shoreline Element, below). This currently unincorporated portion of the site is designated “Rural” under the King County Shoreline Master Program.

### *Consistency Discussion*

Proposed amendments to local shoreline master programs are subject to review by the Washington State Department of Ecology (RCW 90.58.090). The Department reviews proposed amendments to ensure consistency with the policies of the Shoreline Management Act and with guidelines (“Master Program Guidelines”) established by Chapter 173-26 Washington Administrative Code (WAC). It is anticipated that the proposal to amend Tukwila’s Shoreline Master Plan to include the newly annexed territory would be considered a “less than comprehensive amendment” by DOE (see DOE Publication #04-06-018, “Guidance on Application of the WAC 173-26 2003 Guidelines to Less Than Comprehensive Updates or Amendments to Master Programs,” May 2004).

“Less than comprehensive” amendments are first reviewed against the broad principles of the Master Program Guidelines. These include:

- No net loss of shoreline ecological functions.
- Consistency with “use preferences” described by WAC 173-26-201(2)(d), which can be summarized as:
  - Reserve appropriate areas for protecting and restoring ecological functions;
  - Reserve shoreline areas for water-dependent and associated water-related uses;
  - Reserve shoreline areas for other water-related and water-enjoyment uses;
  - Locate single-family residential uses where they are appropriate and can be developed without significant impact to ecological functions or displacement of water-dependent uses; and
  - Limit non-water-oriented uses to those locations where the above described uses are inappropriate or where non-water-oriented uses demonstrably contribute to the objectives of the Shoreline Management Act.
- Public access and use of the shoreline.

Proposed amendments that appropriately address these policies are further reviewed to determine whether the technical, scientific and factual basis for the proposal is appropriate.

The portion of the site subject to annexation and shoreline re-designation is currently designated “Rural” under the King County Shoreline Master Program (SMP). The King County SMP allows intensive commercial and industrial development within the “Rural” environment, subject to the development requirements of the “Urban” environment and other requirements,

where the underlying zoning allows such uses (King County Code Sections 25.20.070 and 25.20.120). The underlying King County zoning for the subject area is “I” Industrial.

Similarly, Tukwila’s “Urban” designation allows intensive urban development of uses allowed by the underlying zoning, subject to additional setbacks, height limits and development standards. Since the use, setback, height restriction and other provisions of the existing King County and proposed Tukwila shoreline master program designations are similar, no net loss of shoreline ecological functions would be anticipated. Additionally, the “use preferences” and public access provisions incorporated into the Tukwila SMP are similar to King County’s and consistent with the Shoreline Management Act and DOE Master Program Guidelines.

The consistency of the Proposed Actions with the adopted City of Tukwila SMP is discussed under City of Tukwila Plans and Policies, below.

## King County Plans and Policies

### **Countywide Planning Policies**

The King County Countywide Planning Policies (CPP) were developed and adopted by the Growth Management Planning Council in 1992 (and subsequently amended), consistent with GMA mandates to provide framework policies to guide development of jurisdictional comprehensive plans. The CPP includes household and employment growth targets for jurisdictions within King County to accommodate within the 20-year growth management planning period. The CPP states that King County’s growth targets should be planned in the context of the zoning capacity of the land. Growth targets are intended to indicate housing and employment capacity that cities should be able to accommodate in the future.

The CPP include growth targets for households and employment for jurisdictions within King County for the period between 2001 and 2022. The CPP household growth target for the City of Tukwila between 2001 and 2022 is 3,200. The target for the Tukwila Potential Annexation Area (PAA) is an additional 5 households. The 2001 to 2022 employment growth target for the City of Tukwila is 16,000. The target for the Tukwila PAA is an additional 497 jobs.

The CPP also designates Urban Centers within the County. Urban Centers are envisioned as areas of concentrated employment and housing, served by transit, with a wide range of other land uses such as retail, recreational, public facilities, and parks and open space. The City of Tukwila contains one designated Urban Center, the Tukwila Urban Center, located generally north of the site. There are currently 13 CPP-designated urban centers in King County. These areas together are intended to accommodate up to one-half of employment growth and one-quarter of household growth in King County over the 20 year GMA-mandated planning period.

### *Consistency Discussion*

As mandated under the GMA, the City of Tukwila’s Comprehensive Plan is consistent with the Countywide Planning Policies. The Comprehensive Plan includes policies to accommodate the CPP housing and employment growth targets city-wide. The City of Tukwila has established goals and policies for the Urban Center that are outlined in the Tukwila Urban Center Element of the Comprehensive Plan (discussed under City of Tukwila Plans and Policies below).

The Proposed Actions would add employment and housing capacity on the site. Full buildout of assumed land uses on Tukwila South would add approximately 28,700 jobs and 1,900 housing units to the City under Alternative 1, or 22,400 jobs and 700 housing units under Alternative 2. These would represent a significant portion of the CPP employment and housing unit growth targets for the City of Tukwila and its PAA for the 2001 to 2022 time period. Campus-type development, called for in the proposed Tukwila South Master Plan, would generally be complementary to the City's vision of the Urban Center (refer to the discussion of the Tukwila Urban Center Element of the City's Comprehensive Plan later in this section and Section 3.6, Land Use for further discussion of the Urban Center). Under the No Action Alternative, the site would accommodate approximately 2,156 new jobs, and no capacity for new housing units on the site would be created.

## City of Tukwila Plans and Policies

### **City of Tukwila Comprehensive Plan**

The City of Tukwila Comprehensive Plan (1995, and subsequently amended) was developed in compliance with GMA and the CPP. The Plan establishes land use goals and policies which are intended to guide future land use and coordinate growth within the City and its planning area over a 20-year planning horizon. In particular, the Comprehensive Plan serves as a guideline for designating land uses, infrastructure development and community services; its policies serve as a foundation for the City's Development Regulations. In accordance with GMA, the Comprehensive Plan includes the Transportation, Housing, Capital Facilities, Utilities and Shoreline elements. The Land Use element is divided into 5 separate elements: Residential Neighborhoods, Transportation Corridors, Tukwila South, Tukwila Urban Center, and Manufacturing/Industrial Center. Tukwila's Plan also includes the following elements: Community Image, Economic Development, Natural Environment, Annexation, Roles and Responsibilities, and Maintenance of the Plan. Policies relevant to the Proposed Actions are highlighted below.

The primary tools for ensuring consistency with the Tukwila Comprehensive Plan would be City Council adoption of a Tukwila South Master Plan (as required by Policy 9.1.3), compliance with applicable City codes and regulations, and a Development Agreement to be adopted as part of the City's overall project approval process. The following pages generally describe the various elements of Tukwila's Comprehensive Plan, and provide brief analyses of the project's consistency with these elements, based on the provisions of the proposed Tukwila South Master Plan and the project description (Alternatives 1 and 2) included in Chapter 2 of this EIS. Details of the proposed Master Plan are described more fully under the Consistency Discussion related to the Tukwila South Element of the Comprehensive Plan, below.

### Community Image Element

The Community Image Element of the Comprehensive Plan establishes goals and policies for the City's image, including overall image, historic preservation, identifiable boundaries, retention of hillside vegetation, riverfront access and amenity, residential neighborhood character, commercial area character, open space and parks.

Described broadly, these goals and policies seek to:

- Promote community pride, identity and interaction.
- Recognize and commemorate the community's cultural and environmental heritage.
- Promote and preserve the "small town" character of existing residential neighborhoods.
- Promote visually attractive, safe and pedestrian-friendly commercial areas.
- Develop a community-wide open space and parks network serving recreational, non-motorized transportation, community linkage, and environmental and aesthetic functions.

### *Consistency Discussion*

Development under the proposed Tukwila South Master Plan would promote community interaction by providing public and private amenities such as plazas, landscaped open space areas and pedestrian/bicycle pathways that would link the campus to adjacent areas. The community's environmental heritage would be recognized through preservation of much of the western hillside and through protection of open space and improvement of fish habitat, thus adding to the community's open space network. Building design, construction, and materials would be coordinated through comprehensive urban design principles, and pedestrian orientation would be emphasized.

No specific measures have been proposed to recognize or commemorate the community's cultural heritage (see section 3.10, Cultural and historic resources). While no specific proposals have been offered to expand the City's parks network, the proposed Tukwila South Master Plan recognizes opportunities for new public access to the western hillside and the Green River, connections to the Green River Trail, and possible access to Briscoe Park in Kent. Proposed pedestrian/bicycle pathways would provide recreational opportunities.

### Economic Development Element

Enhancement of the Community's economic well-being is the overriding goal of the Economic Development Element. The Economic Development Element establishes a general philosophy of sustained moderate growth, targeting high salary industries and providing capacity to meet Tukwila's employment targets as established by the King County Countywide Planning Policies (CPPs). Goals and policies call for the use of capital investments to encourage development that supports family-wage jobs, concurrent with substantial private actions. Policies also support seeking outside funding to encourage economic development, and partnering with the private sector to fund infrastructure as part of a sub-area plan to encourage redevelopment. While generally supporting the retention of existing industrial areas, the Comprehensive Plan specifically supports the conversion of industrial uses in the Tukwila South area in conjunction with an approved master plan.

The importance of efficiency and certainty in regulatory processes, job training and promotion are also recognized.

### *Consistency Discussion*

The proposal would be consistent with the Economic Development Element of the Tukwila Comprehensive Plan.

## Housing Element

The City's housing policy emphasizes the importance of improving the existing housing stock and neighborhood quality, and providing a full range of housing opportunities for persons in all stages of life. It recognizes Tukwila's role in providing a fair share of the region's affordable housing, and seeks to encourage a full range of housing types. The Housing element establishes a target of 3,200 new housing units, consistent with the Countywide Planning Policies (CPPs). It seeks to provide sufficiently zoned housing potential, within the Urban Center and elsewhere, to achieve this target.

### *Consistency Discussion*

The Proposed Actions could include new housing (EIS Alternatives 1 and 2 assume development of between 700 and 1,900 residential units by 2030). The proposed Master Plan provides the potential for a variety of mixed income housing types organized to create neighborhoods or included within mixed-use developments. Creation of new housing within the Tukwila South area would help the City achieve its housing target.

## Natural Environment Element

The Natural Resources Element identifies environmentally sensitive areas (also known as "critical areas") and sets forth goals and policies aimed at their management and protection. It focuses on balancing land use and economic development practices with environmental protection. It promotes a "multiple use" approach to critical area protection, recognizing the often-overlapping benefits of habitat protection, hazard mitigation and recreation.

Specific goals and policies seek to retain and improve critical area functions by applying "best available science" to land use and development regulation. They recognize the importance of retaining native vegetation, controlling runoff and maintaining water quality. Appropriately timed mitigation is required to ensure no net loss of resource area functions. Special consideration is given to protecting anadromous fish habitat. Protection of paleontological and archeological artifacts and sites is established as a City goal.

The Natural Resources element promotes development flexibility by recognizing the potential for replacing wetland functions as an alternative to preservation, and by allowing off-site wetland and flood control mitigation under appropriate circumstances.

### *Consistency Discussion*

The City's Sensitive Areas Ordinance (SAO) was adopted to ensure that development and redevelopment is consistent with Washington State Growth Management Act (GMA) critical area requirements and the City's Natural Resources goals and policies. The SAO defines standard mitigation requirements for alteration of sensitive areas (including wetlands and streams); if specific criteria are met, the SAO allows for mitigation under a Sensitive Area Master Plan (SAMP). The consistency of the Proposed Actions with the adopted City of Tukwila SAO is discussed further under Sensitive Areas Ordinance, below.

Under Alternatives 1 and 2, impacts to onsite wetlands and agricultural ditches/ditched streams would occur during the infrastructure development phase. The Proposed Actions would mitigate impacts via implementation of a proposed Sensitive Area Master Plan (SAMP) during this initial

phase of development (refer to Sections 3.3 and 3.4, Plants and Animals and Wetlands and Appendix L for details). The SAMP would include: creation of new off-channel habitat along the Green River; rehabilitation of wetlands; and restoration of Johnson Creek from its current channelized condition. This comprehensive approach to natural resources is intended to result in net benefits to anadromous fisheries, overall water quality, and wetland, stream, wildlife and fisheries habitat. The proposed SAMP would include retention of approximately 80 percent of the existing onsite wetland acreage, as well as preservation of all natural streams and the majority of steep slopes on the hillside. All mitigation elements would occur onsite.

Temporary erosion and sedimentation control (TESC) best management practices (BMPs) as specified by the King County Surface Water Design Manual (SWDM) (1998) and Ecology manual (2001) would be implemented for infrastructure development to prevent impacts of erosion and sedimentation to onsite ditches, streams and the Green River. Temporary and permanent stormwater control systems would also be installed during infrastructure development. The permanent stormwater control system would be sized to meet the water quality and runoff control requirements for the entire developed portion of the site at full buildout. The Green River Management Agreement (GRMA) and Pump Operations Procedures Plan (POPP) would apply to stormwater discharge from the south site basin. The POPP requirements for this basin would be met by the proposed stormwater control system and flood storage provided in the Green River Off-Channel Habitat Restoration Area. Flood levels in the Johnson Basin would not exceed predevelopment levels (see Section 3.2, Water Resources and Appendices B and C for further information).

The Proposed Actions would preserve approximately 62 acres of undisturbed hillside in areas potentially susceptible to varying degrees of slope instability. Disturbances to other areas of potential instability would be subject to best management practices and the recommendations of geotechnical analyses (see Appendix A and Section 3.3 of this DEIS).

### Shoreline Element

The Shoreline Element represents the City's vision for the shoreline, as implemented through the Shoreline Master Plan (SMP; discussed below), and defines the relationship between the SMP and the City's Comprehensive Plan while reflecting the requirements of the State Shoreline Management Act. This element establishes goals and policies for public access, habitat protection and restoration, and development along the river. The Shoreline Element seeks to foster economic vitality while preserving the long-term benefits of the Green/Duwamish River. The area subject to the Proposed Actions is designated "Urban-Open Space Environment" by the Shoreline Element.

Specific goals and policies call for designing and locating development to minimize or mitigate impacts on habitat, river vegetation, public access, historical resources and flood control. Multiple uses are encouraged, with water-enjoyment uses as transition between the river and non-water related uses. The identity of the Green/Duwamish River as a unique community asset should be promoted through high-quality design in such areas as site planning, architecture and landscaping. The Shoreline Element promotes increasing public access to publicly owned shoreline areas, through means including implementation of the King County Green River Trail Master Plan. Flexibility is emphasized concerning public access to the shoreline on privately owned sites. Options include providing or maintaining views of the water, providing outdoor spaces near the river, or providing a private natural area in lieu of physical

public access. The Shoreline Element recognizes the legitimacy of private property concerns about public access relating to privacy, safety and security.

### *Consistency Discussion*

Part of the proposal is to amend Tukwila's Shoreline Master Plan by applying an appropriate "shoreline environment" designation to any newly annexed territory. Designation of the newly annexed Tukwila South shoreline as "Urban Environment" would be consistent with the Shoreline Element of the Tukwila Comprehensive Plan.

The Shoreline Element is implemented through the City's Shoreline Master Plan (SMP). The consistency of the Proposed Actions with the SMP is discussed under Shoreline Master Plan below. No specific building development plans have been formulated; therefore, no specific land uses have been identified within the shoreline zone (with the exception of the Green River Off-Channel Habitat Restoration Area and a temporary haul road in the southern portion of the site).

Development under Alternatives 1 and 2 would foster economic vitality and would also improve river habitat through creation of the Green River Off-Channel Habitat Restoration Area (see discussion under Sensitive Areas Ordinance below). The Proposed Actions would also include relocation of the existing flood protection barrier dike from S 196<sup>th</sup> Street to the southern boundary of the site (north of S 204<sup>th</sup> Street) to increase the contiguous buildable area of the site; the relocation would protect public safety and property on the site north of S 204<sup>th</sup> Street from flood hazards.

The development concept established by the proposed Tukwila South Master Plan would provide opportunities for new public access to the Green River shoreline and connections to the existing Green River Trail. Specific provisions for public access are currently unknown. The proposed Green River Off-Channel Habitat Restoration Area could meet at least a portion of the proposal's "public access" requirement, in lieu of physical access. The Tukwila South Master Plan also proposes that development design and construction be coordinated by comprehensive design principles. While not yet specified, these design principles could address issues of public access and "high quality design" as called for by the Shoreline Element.

### Annexation Element

The purpose of the Annexation Element is to ensure a smooth transition, regarding public services, infrastructure, utility extensions, and inter-jurisdictional issues, when land is annexed to the City. Relevant goals and policies include ensuring annexations do not detract from adopted level of service standards, and ensuring that zoning proposed for an annexation area is consistent with the City's Comprehensive Plan and other land use requirements.

### *Consistency Discussion*

Annexation of the southern portion of the Tukwila South site, which is currently located in unincorporated King County, to the City of Tukwila is proposed under a separate action. Consistent with the goals of the Annexation Element, adequate infrastructure for the newly annexed area, would be provided including major roads, a stormwater management system, and utilities (see Section 3.16, Utilities, for further detail). It is intended that approval of a

Development Agreement between La Pianta LLC and the City of Tukwila would provide a comprehensive approach to the mitigation of future transportation impacts of buildout in the annexed area and within surrounding areas; this would be intended to ensure that the City's level of service standards would be met (see the Section 3.12, Transportation, for further detail). Zoning consistency with the City's Comprehensive Plan and other land use requirements would be accomplished through Planning Commission and City Council review and approval of the proposed Tukwila South Master Plan and the previously referenced Development Agreement.

### Residential Neighborhoods Element

This element pertains primarily to established neighborhoods in other portions of the city (none are adjacent to the site); however, one policy relevant to the site calls for allowing Planned Residential Developments (PRDs) for multi- and single-family use within the Tukwila South Master Plan Area, in conjunction with the City Council's approval of a Tukwila South Master Plan. Additional policies are aimed at promoting neighborhood quality by managing noise, providing pedestrian connections, undergrounding utilities, providing neighborhood gathering spots and by applying appropriate design criteria, standards and guidelines.

#### *Consistency Discussion*

Assumed uses under Alternatives 1 and 2 could include PRD development on the site, consistent with the Residential Neighborhoods Element policy. PRD development could enable efficient use of building sites for development at urban densities, while encouraging preservation of natural areas and amenities. Compliance with the City's existing Multi-family Design Guidelines and development of comprehensive design principles, as suggested by the proposed Tukwila South Master Plan, would promote residential neighborhood quality as intended by the Residential Neighborhood Element.

### Tukwila Urban Center Element

The Tukwila Urban Center Element establishes the City's vision for the CPP-designated Urban Center, which is generally north of the site (it includes a small portion of the site adjacent to S 180<sup>th</sup> Street). This vision foresees a high density, mixed-use area providing regional employment, housing, shopping and recreational opportunities, served by high-capacity transit. The Urban Center Element establishes goals and policies for the Urban Center related to land uses, access and transportation linkages. It recognizes the importance of public investment in infrastructure and amenities, enhanced transit services and active promotion of new development, to achieving the Urban Center vision.

#### *Consistency Discussion*

The site is located generally south of the Tukwila Urban Center (TUC). A small portion (nine acres) of the site is located within the TUC. Assumed development of the Tukwila South site under Alternatives 1 and 2 would include a mix of uses at urban densities. The TUC Element does not define land uses for areas adjacent to the TUC. The "retail village" and "mixed-use district" concepts assumed for the northern portion of the site under Alternatives 1 and 2 would be compatible with the adjacent TUC. It is likely that employees and residents onsite would be attracted to the Urban Center, which could lead to overall increased levels of business activity in the Tukwila Urban Center and surrounding areas. However, it is also possible that some retail uses within the Tukwila South site could draw retail patronage from similar uses within the

Tukwila Urban Center over the long-term. Ultimately, the specific businesses that choose to locate at Tukwila South, together with development regulations and future market forces, would determine the specific effects on retail businesses within the Tukwila Urban Center (refer to Section 3.6, Land and Shoreline Use for further discussion).

### Utilities Element

The Utilities Element addresses the needs of the City in meeting future demand for sewer and water, surface water management, solid waste, electricity, natural gas and telecommunications services. This element covers utilities provided by the City and by other agencies. Relevant goals and policies call for: basing utility extensions, including their size, on the Comprehensive Plan land use element for the area; ensuring that new development and redevelopment within Tukwila do not cause significant adverse upstream or downstream impacts on flooding, erosion, and natural resources; approving development only if adequate utilities are available within a reasonable period; requiring onsite retention and treatment of surface water for both development and redevelopment, unless a regional facility is constructed or storage provided in the Green River; designing and maintaining utility systems so as to minimize their impact on adjacent neighborhoods and businesses; and, adopting and applying the 1998 King County Surface Water Design Manual.

### *Consistency Discussion*

During the infrastructure development phase, major utility infrastructure (stormwater conveyance pipe, water transmission line, sewer trunk line, electricity, gas, and telecommunications) would be extended through the site within the Southcenter Parkway right-of-way and would be sized for assumed development under Alternatives 1 and 2, consistent with the land use policies for the Tukwila South element (discussed below). Adequate capacity for water supply (Highline Water District) and sanitary sewer service (City of Tukwila) would be available to serve the buildout under Alternatives 1 and 2, assuming completion of downstream wastewater improvements identified in Section 3.16.1, Utilities. Installation of utilities would be coordinated with the City of Tukwila, Highline Water District and Puget Sound Energy. Extensions to these major utility lines within Southcenter Parkway would be constructed as future development occurs within the individual development planning areas (refer to Chapter 3.16, Utilities, for more detail). Relocation of the flood protection barrier dike during infrastructure development would prevent flooding north of S 204<sup>th</sup> Street, enabling the portion of the site between S 196<sup>th</sup> Street and S 204<sup>th</sup> Street to be developed. Temporary and permanent stormwater management systems in accordance with the 1998 King County Surface Water Design Manual (adopted by the City of Tukwila) would be constructed during initial infrastructure development; these systems would prevent adverse impacts from construction and development, and would provide water quality treatment for the developed portion of the site under Alternatives 1 and 2. Refer to Section 3.16, Utilities, Section 3.2, Water Resources, and Chapter 2 for further discussion.

### Transportation Element

The Transportation Element guides the City's Transportation Improvement Plan, Capital Improvement Plan, and land use and zoning decisions to ensure necessary improvements are provided concurrent with demand. This element establishes transportation level of service (LOS) standards within the City (see Section 3.12.1 for an explanation of "Level of Service")

standards). Level of service standards for areas within the City likely to be affected by project traffic include:

- The Tukwila Urban Center area LOS average is not to exceed E.
- The West Valley Highway corridor LOS average is not to exceed D mitigated.
- The Southcenter Parkway corridor south of S 180th Street is not to exceed average LOS E without agreement with developers, including contractually scheduled capacity improvements.

The Transportation Element requires that these LOS standards be maintained through planning, development and improvement decisions. Maintenance of established LOS standards in the development approval process is accomplished through implementation of the City's Transportation Concurrency Standards and Impact Fees ordinance, codified as Chapter 9.48, Tukwila Municipal Code. Policies also support additional mitigation using State Environmental Policy Act (SEPA) authority when development would affect locations operating in expanded LOS range (i.e., worse than LOS F).

The Transportation Element identifies increased transit use and ridesharing measures as of higher priority than street capacity improvements. It also supports transportation demand management strategies and non-motorized transportation facilities. The element calls for the provision of foot trails as opportunities and development occur.

### *Consistency Discussion*

Potential transportation impacts from development of the EIS Alternatives were analyzed relative to consistency with the City's adopted transportation policies and LOS standards. Refer to Section 3.12, Transportation and Appendix I for details.

### Capital Facilities Element

The Washington State Growth Management Act (GMA) calls for Comprehensive Plans to include a Capital Facilities Element that is consistent with the Land Use Element(s) so that anticipated growth can be adequately served by infrastructure. The Tukwila Comprehensive Plan Capital Facilities Element guides City decisions concerning infrastructure financial planning and project financing, in order to achieve public facilities that reflect desired levels of quality, address deficiencies and anticipate the needs of growth.

Specific policies seek to:

- Ensure that capital facilities are provided within six years of impacts that degrade standards.
- Balance infrastructure investment between the residential and commercial sectors.
- Allow issuance of bonds for facilities if repayment can be made from revenue allocations.
- Utilize general operating revenues for projects identified in the Capital Improvement Plan, if substantial funding from grants, developers, other jurisdictions or other sources become available.
- Utilize City funding for preliminary engineering and design of commercial street projects if public health, safety and welfare will benefit.

- Use a mitigation-based fee system for affected City functions as determined through SEPA evaluation of individual development applications.

Additional policies call for utility rates structured to ensure adequate infrastructure development, and use of bonded indebtedness to fund utilities if there is a long-term benefit to the affected enterprise fund.

### *Consistency Discussion*

Alternatives 1 and 2 would include improvements to capital facilities such as roads and utilities, consistent with the Tukwila South Element of the Comprehensive Plan. The proposed expansion of Southcenter Parkway south through the site and the realignment of South 178<sup>th</sup> Street would be accomplished in the initial infrastructure development phase. Under Alternatives 1 and 2, major utility extensions would be in place prior to development on the site (extensions to specific building sites would be completed at the time of individual development). Overall, transportation system improvements, necessary to maintain level of service standards, would be timed with future development based on a Development Agreement between the applicant and the City. Infrastructure financing decisions would be assumed to be consistent with the Capital Facilities Element.

### Tukwila South Element

The site is located in the Tukwila South planning area. The Comprehensive Plan vision for the Tukwila South area is as follows:

*The Tukwila South area currently is a mix of industrial and agricultural uses with a high potential for redevelopment and the ability to transition to a dynamic urban multi-use district while still supporting the existing, lower density uses. This area represents an outstanding opportunity to create major, new employment, commercial, and residential areas. The size (approximately 400 acres), location adjacent to the Tukwila Urban Center, consolidated land ownership, and proximity to the airport make this a site that will attract attention from national and international companies looking for expansion opportunities.*

*The development of this area will be a gradual process that should be facilitated by a well-developed master plan.*

*Connections to the airport, local and regional transit facilities and to the Tukwila Urban Center through improved roadways and new transit initiatives will be important to achieve the maximum potential for this area.*

**Comment:** The Proposed Actions (Alternatives 1 and 2) would provide an opportunity to realize the Comprehensive Plan vision for Tukwila South, including transforming the area into a dynamic urban multi-use area with major, new employment, commercial, and residential uses that could attract national and international companies.

Specific goals and policies of the Tukwila South Element are shown below, followed by a discussion of consistency.

*Goal 9.1 – Commercial/Industrial Valley. Enhanced and enlarged commercial and industrial land supply within the Puget Sound urban area with community resources such as the shoreline, wetlands, fish and wildlife habitats, hillsides, watercourses, and recreational trails maintained, enhanced, and utilized.*

*Comment:* The proposed infrastructure improvements and Master Plan would provide for an enlarged commercial and industrial land supply while maintaining and in some cases enhancing community resources.

*Policy 9.1.1. Allow the industrial areas south of 180th Street in order to support business and employment opportunities and minimize the displacement of manufacturing and non-retail uses.*

*Comment:* The proposed Master Plan would allow continuation of the industrial areas south of S. 180<sup>th</sup> Street, thus minimizing displacement of manufacturing and non-retail uses.

*Policy 9.1.2. Allow commercial uses to compete and mix with industrial uses for sites throughout the sub area. (Implementation strategies for this policy include commercial and light industrial zoning district complementary and compatible with residential areas, the Tukwila Urban Center and sensitive areas.)*

*Comment:* The proposed Master Plan would allow commercial uses to compete and mix with industrial uses.

*Policy 9.1.3. Require a master plan prior to any significant land altering that details full development of the Tukwila South Master Plan Area infrastructure (see Comprehensive Land Use Map Legend) with residential, commercial or light industrial uses and open space network areas The master plan shall address: the multiple issues of hillside, wetland and watercourse preservation and impacts mitigation, in accordance with Tukwila policies; protection of fish and wildlife habitat; appropriate flood protection and shoreline treatment, in accordance with Tukwila shoreline policies and guidelines; and the realignment of 57th Avenue South to maximize parcel size and to coordinate with the overall development plan.*

*Comment:* Adoption of the Tukwila South Master Plan would meet the general requirement of Policy 9.1.3. The proposed Master Plan (via Alternatives 1 and 2) details construction of the area's infrastructure, including arterial improvements and major utility extensions, stormwater control, and relocation of an existing flood protection barrier dike as the initial phase of development. The Plan indicates that a secondary on-site street system would be developed with pedestrian and bicycle facilities as development occurs, and discusses the provision of pedestrian and bicycle pathways as part of the development concept. Recreational and public safety infrastructure needs (public parks and fire station needs) are not directly addressed in the proposed Master Plan but are evaluated in Sections 3.9 and 3.15 of this Draft EIS.

Commercial, residential and light industrial land uses are discussed in the proposed Master Plan, which identifies potential general locations and quantities

for these uses. The proposed Plan emphasizes flexibility concerning whether, how much and where such uses could occur, indicating that market forces would determine the specific level, mix and location of development.

The proposed Master Plan (Alternatives 1 and 2) identifies approximately 100 acres (20 percent of gross land area) for reserved open space. Open space areas would include: a rehabilitated wetland area north and south of S. 204<sup>th</sup> Street (32 acres); the relocated and enhanced new Johnson Creek corridor (.34 acres); a newly created off-channel habitat areas in the Green River (4.7 acres); and preservation of a portion of the western hillside (approximately 62 acres). The Master Plan does not identify specific mechanisms for ensuring the long-term maintenance of these open space areas.

Additionally, the proposed Master Plan indicates that landscaped open spaces, plazas and courtyards, pedestrian/bicycle pathways, and additional public access to the Green River would be provided and that “buildings would frame open spaces with central plazas and public gathering spaces.”

The proposed Master Plan addresses hillside impacts, indicating that portions of the hillside to the north and south would be regraded to provide for the realignment of S. 178<sup>th</sup> Street and to provide fill for the project (regrading would also provide for the location of the proposed north stormwater quality/retention pond). The proposed Plan does not provide specific information regarding revegetation of regraded areas. As previously noted, approximately 62 acres of hillside would be preserved.

The proposed Master Plan includes as an appendix, a proposed “Sensitive Area Master Plan” (SAMP, Appendix L to this Draft EIS). Together, the proposed Tukwila South Master Plan and the SAMP propose a comprehensive approach to mitigating impacts to wetlands, watercourses, fish and wildlife habitat.

The proposed Master Plan addresses flood protection by proposing relocation of an existing flood protection barrier dike, and indicates future development would be consistent with Tukwila’s Shoreline Master Program.

*Policy 9.1.4. Consideration may be given to a limited hillside topography modification for providing fill material for development in the valley portion of the Tukwila South Area. Reconstruction of the hillside must result in a moderately sloped, stable, natural-appearing environment that may include benches that are suitable for commercial and residential development.*

Comment: The proposed Master Plan provides for limited hillside modifications for multiple purposes, including provision of fill material. The development proposal would result in modified hillsides with finished slopes of 1.5H:1V (Horizontal:Vertical), which have been determined to be feasible (see Section 3.1, Earth, and Appendix A). Measures to provide a “natural-appearing environment” have not been specified to date.

*Policy 9.1.5. Incorporate into the master plan for the Planned Area building material, design, land use, and other site organization review elements vital to*

*issues of entry or gateway to the City and transition to the farmland district to the south and low-density residential districts to the west and north.*

*Comment:* The proposed Master Plan discusses general design and site organization principles (e.g., walkable districts, amenities, pathways, strategically located parking, etc.). As previously noted, the Plan indicates that market forces would determine specific amounts and location of land uses. It indicates that building design, construction and materials will be of high quality and coordinated through unspecified “comprehensive design principles”. The proposed Plan identifies opportunities for highlighting Tukwila South’s most important points of entry as “gateways.”

*Goal 9.2 – Residential Areas. Unique residential neighborhoods, and housing opportunities that serve a broad range of ages, family mixes, lifestyles and incomes.*

*Comment:* The proposed Master Plan indicates that residential use “is being considered,” and identifies opportunities for mixed income, mixed tenure housing.

*Policy 9.2.1. Emphasize noise attenuation, pedestrian access and high quality building and landscape treatment in development review for residential uses.*

*Comment:* See Section 3.14 for analysis of noise issues. The proposed Master Plan proposes unspecified pedestrian improvements and landscaping, and indicates that design and materials would be coordinated through unspecified comprehensive design principles.

*Policy 9.2.2. Allow residential development in the Tukwila South area in a variety of densities and configuration. Consider single-family detached residences, mixed-use developments, townhomes, zero-lot line developments or stand-alone multifamily developments.*

*Comment:* The proposed Master Plan identifies a variety of potential housing densities and configurations, from low-rise (1-3 stories) townhouses to mixed-use, multi-story (6-stories or greater) options.

*Goal 9.3 – Open Space Network. Protection and enhancement of the natural environments and effective integration of them into the residential and commercial/light industrial environments.*

*Comment:* The proposed Master Plan includes approximately 100 acres of reserved open space (see comment on Policy 9.1.3, above). It also indicates that unspecified open spaces, plazas, courtyards, pathways and pocket parks would be incorporated into the project.

*Policy 9.3.1. Minimize disturbance of critical areas both on the hillside and in the valley where appropriate to preserve significant features.*

*Comment:* The proposed Master Plan includes as an appendix, a proposed “Sensitive Area Master Plan” (SAMP). It also proposes preservation of

approximately 62 acres of hillside. Together, the proposed Tukwila South Master Plan and the SAMP propose a comprehensive approach to protecting critical areas and other significant features.

*Policy 9.3.2. During development or at the time of trail improvements, if earlier, negotiate for trail easements where appropriate while ensuring sufficient provision for privacy and security.*

Comment: No specific trail locations have been proposed at this time. Such trails would be specifically determined based on the needs of future users and as part of individual development application review at the site.

*Goal 9.4 – Transportation. An enhanced and enlarged street network that separates residential neighborhoods and commercial/industrial area circulation, provides greater accessibility for pedestrian and residents of the area and is safe and functional for the variety of demands placed upon it.*

Comment: The proposal includes construction of improvements to Southcenter Parkway (extended) and relocation of S. 178<sup>th</sup>, with provisions for future expansion. The proposed Master Plan anticipates opportunities for mixing residential uses, which would make separation of residential and commercial circulation impractical. See Section 3.12 for analysis of traffic safety and functionality.

*Policy 9.4.1. Improve and increase east/west linkages between commercial services, the residential neighborhoods and the area's community resources, such as the riverfront, river, hillside trails, and historic Mess Cemetery.*

Comment: The Proposed Actions include the future construction of an east-west road from Orillia Road into the site. It also proposes realigning S. 178<sup>th</sup> Street (see Section 3.12 for analysis of impacts on east-west traffic). The proposed Master Plan indicates Tukwila South would connect externally to neighboring areas and internally via a variety of pedestrian, bicycle, automobile and transit linkages. No specific plans for linkages to the Green River, hillside trails or the Mess Cemetery have been proposed at this time.

*Policy 9.4.2. Design and improve access points to the residential areas so that the quality and image of the residential areas are high.*

Comment: Access points to residential areas would be designed if and when specific residential development is proposed at the site.

*Policy 9.4.3. Rename 57th Avenue South as Southcenter Parkway to eliminate designation confusion and enhance community identity for the area as a part of Tukwila.*

Comment: Renaming 57<sup>th</sup> Avenue south can occur after annexation.

*Policy 9.4.4. Pursue additional access to the Tukwila Urban Center through additional entries and exits (ramps) from Interstate 5 at S 200th Street.*

Comment: Additional access is not proposed as part of the Tukwila South proposal. See Section 3.12 for discussion of transportation system improvement needs for the proposal project.

*Goal 9.5 – Economic Development. New, high quality development with public amenities that also respect the natural environment.*

Comment: The proposed Tukwila South Master Plan indicates that future development would be of “institutional quality” and would be guided by comprehensive design principles. The proposed Plan indicates that Tukwila South would create a “comprehensive amenity system” that “leverages” its location between the wooded hillside to the west, and the Green River to the east. Areas set aside for environmental protection could form a portion of this amenity system.

*Policy 9.5.1. Require a master plan to guide the development of the Tukwila South area.*

Comment: The Tukwila South Master Plan, as proposed or as modified by the Tukwila City Council, is intended to meet this requirement.

*Policy 9.5.2. Support improved connections to the airport, Tukwila Urban Center, and transportation facilities through improvements and new transit initiatives.*

Comment: Sound Transit is evaluating an improved non-auto-based transportation link connecting Tukwila South with Link Light Rail at SeaTac International Airport and with Sounder Commuter Rail service at Tukwila Station (Longacres). This feasibility study should be completed during the first half of 2005. Other possible transportation improvements are described in Section 3.12, Transportation of this Draft EIS.

### *Consistency Discussion*

The primary tools for ensuring consistency with the Tukwila South Element would be City Council adoption of a Tukwila South Master Plan (as required by Policy 9.1.3), compliance with applicable City codes and regulations, and a Development Agreement to be adopted as part of the City’s overall project approval process. The Tukwila South proposal (Alternatives 1 and 2), as described by Chapter 2 of this Draft EIS and by the proposed Tukwila South Master Plan, would be generally consistent with the Tukwila Comprehensive Plan.

The “No Action” alternative (Alternative 3) would be less consistent with the Tukwila Comprehensive Plan. Under Alternative 3, the City would be less likely to achieve its goal of transitioning the Tukwila South area into an urban, multi-use district.

### **City of Tukwila Parks, Golf and Open Space Plan, 2001-2006**

The *City of Tukwila Parks, Golf and Open Space Plan, 2001-2006* includes goals and objectives for the City’s Park system that address public access; public involvement; park and recreational facilities; public spaces, linkages and nodes; open space; and, maximizing the benefit from financial expenditures. Relevant goals and objectives include: maximizing public access to

recreation opportunities (Goal I.); distributing park facilities throughout the City of Tukwila to encourage equal opportunity for recreation participation (Goal I.C.); developing neighborhood recreation facilities within a half-mile walking distance of all residential areas (Goal I.D.); linking residential areas to commercial areas, schools, parks, and the shoreline via sidewalks, pathways, trails and bikeways (Goal I.E.); providing a system of parks that provides direct access to a park within one-half mile of all City areas (Goal III.A.); providing recreational opportunities for the City's large "day-use" population of workers and shoppers, in close proximity to employment and retail centers (Goal III.F.); providing public plazas to support major centers of government and business activity or to capitalize on major environmental features, such as views or water features (Goal IV.A.); providing vehicle and pedestrian-oriented nodes, such as gateway signs and landscaping, mini-parks, plazas, and viewpoints (Goal IV.D.); preserving areas with critical or unique features, such as stream corridors, wildlife habitats, shorelines and wetlands (Goal V.A.); improving public access to, and use of, shorelines, where the environment is capable of supporting more intensive use (Goal V.B.); encouraging the provision of private recreation facilities in new high-density residential developments (Goal VI.A.3.); and, encouraging the private development and operation of recreational facilities (Goal VI. C.).

The *City of Tukwila Parks, Golf and Open Space Plan, 2001-2006* evaluates future park and recreational facility needs using analysis techniques that include: conformance with goals and objectives; observations of current facility use; public requests and comment; analysis of physical characteristics of potential new park sites; analysis of growth and development patterns; and donation and grant opportunities. The *Plan* does not include any specific level-of-service (LOS) standards for park and recreational facilities.

### *Consistency Discussion*

Alternatives 1 and 2 would provide increased recreational opportunities on the site, on an incremental basis, as the site is developed. This could include a mix of landscaped open space, plazas and courtyards, and pedestrian/bicycle pathways associated with campus style research and office development, new onsite recreation space (such as fitness centers and health clubs that would be provided privately), and pedestrian/bicycle pathways associated with residential development on the site (refer to Section 3.9, Parks and Recreation and Chapter 2 for more detail). Open space could also include new opportunities for public access to the Green River shoreline. Residential areas of the site could be within walking distance of open space opportunities, and pedestrian linkages to retail and office areas of the site could be provided. With proposed campus-style development, opportunities for pedestrian use of the site would be greater under Alternatives 1 and 2 than under the No Action Alternative. In the future, a possible pedestrian connection(s) could be created to link the site to the Green River Trail and Briscoe Park on the east side of the Green River.

Under Alternatives 1 and 2, overall habitat and natural features on the site would be enhanced, with the proposed Green River Off-Channel Habitat Restoration Area, new Johnson Creek and wetland rehabilitation (see the discussion of the City of Tukwila [Sensitive Areas Ordinance](#) below).

### **City of Tukwila Sensitive Areas Ordinance**

The City's Sensitive Areas Ordinance (SAO) implements the "critical areas" requirements of the Growth Management Act (GMA). The purpose of the City's SAO is to "*protect the environment,*

*human life and property, designate and classify ecologically sensitive and hazardous areas and to protect these areas and their functions and values, while also allowing for reasonable use of public and private property.” (TMC 18.45.010A) The SAO establishes standards in order to meet goals which include but are not limited to: minimizing development impacts on the natural functions and values of environmentally sensitive areas; protecting water resources, fish-bearing waters and wildlife habitat; preventing erosion; and, protecting aesthetic resources and distinctive natural features (TMC 18.45.010B).*

The SAO provides for designation of Sensitive Area Master Plan overlays and preparation of Sensitive Area Master Plans. These provisions are intended to encourage a comprehensive approach to critical area protection, enhancement and creation, where certain criteria related to site size and presence of environmentally sensitive areas are met, and where a comprehensive plan for alteration and mitigation would result in net environmental benefits, giving special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries.

The SAO contains standard provisions that apply if a Sensitive Area Master Plan is not implemented. The standard provisions limit disturbance of sensitive areas through restrictions on allowable uses, buffer requirements, requirements for sensitive area studies, mitigation provisions and other standards (see Appendix L for a discussion of standard provisions and the proposed Sensitive Area Master Plan).

### Sensitive Area Master Plan

Tukwila Municipal Code (TMC) 18.45.160(A) provides *“an alternative to preservation of existing individual wetlands, watercourses and their buffers in situations where an area-wide plan for alteration and mitigation will result in improvements to water quality, fish and wildlife habitat and hydrology beyond those that would occur through the strict application”* of the other provisions of Tukwila’s Sensitive Areas Ordinance.

TMC 18.45.160 further states that:

- B. The City Council may designate certain areas as Sensitive Area Master Plan Overlay districts for the purpose of allowing and encouraging a comprehensive approach to sensitive area protection, restoration, enhancement and creation in appropriate circumstances utilizing best available science. Designation of Sensitive Area Master Plan Overlay districts shall occur through the Type 5 decision process established by TMC 18.104.*
- C. Criteria for designating a Sensitive Area Master Plan Overlay district shall be as follows:*
  - 1. The overlay area shall be at least 10 acres.*
  - 2. The City Council shall find that preparation and implementation of a Sensitive Area Master Plan is likely to result in net improvements in sensitive area functions and values when compared to development under the general provisions of TMC Chapter 18.45.*
- D. Within a Sensitive Area Master Plan Overlay district, only those uses permitted under TMC 18.45.070, 18.45.090 and 18.45.110 shall be allowed within a Type 1 wetland, a Type 1 watercourse, or their buffers.*

- E. Within a Sensitive Area Master Plan Overlay district, the uses permitted under TMC 18.45.070, 18.45.090 and 18.45.110 and other uses as identified by an approved Sensitive Area Master Plan shall be permitted within Type 2 and Type 3 wetlands and their buffers; and within Type 2, 3 and 4 watercourses and their buffers, provided that such uses are allowed by the underlying zoning designation.
- F. A Sensitive Area Master Plan shall be prepared under the direction of the Director of Community Development. Consistent with subsection A, the Director may approve development activity within a Sensitive Area Overlay District for the purpose of allowing and encouraging a comprehensive approach to sensitive areas protection, creation, and enhancement that results in environmental benefits that may not be otherwise achieved through the application of the requirements of TMC Chapter 18.45.
- G. The Director shall consider the following factors when determining whether a proposed Sensitive Areas Overlay and Master Plan results in an overall net benefit to the environment and is consistent with best available science:
1. Whether the Master Plan is consistent with the goals and policies of the Natural Environment Element of the Tukwila Comprehensive Plan;
  2. Whether the Master Plan is consistent with the purposes of TMC Chapter 18.45 as stated in TMC 18.45.010;
  3. Whether the Master Plan includes a Mitigation Plan that incorporates stream or wetland restoration, enhancement or creation, meeting or exceeding the requirements of TMC 18.45.090(D) and/or TMC 18.45.110(D), as appropriate;
  4. Whether proposed alterations or modifications to sensitive areas and their buffers and/or alternative mitigation result in an overall net benefit to the natural environment and improves sensitive area functions and values;
  5. Whether the Mitigation Plan gives special consideration to conservation and protection measures necessary to preserve or enhance anadromous fisheries; and
  6. Mitigation shall occur on-site unless otherwise approved by the Director. The Director may approve off-site mitigation only upon determining that greater protection, restoration or enhancement of critical areas could be achieved at an alternative location within the same watershed.
  7. Where feasible, mitigation shall occur prior to grading, filling or relocation of wetlands or watercourses.
  8. At the discretion of the Director, a proposed Master Plan may undergo peer review, at the expense of the applicant. Peer review, if utilized, shall serve as one source of input to be utilized by the Director in making a final decision on the proposed action.
- H. A Sensitive Area Master Plan shall be subject to approval by the Director of Community Development. Such approval shall not be granted until the Master Plan has been evaluated through preparation of an Environmental Impact Statement (EIS) under the requirements of TMC 21.04. The EIS shall compare the environmental impacts of development under the proposed Master Plan relative to the impacts of development under the standard requirements of TMC Chapter 18.45. The Director shall approve the Sensitive Area Master Plan only if the evaluation clearly demonstrates overall environmental benefits, giving special consideration to conservation or protection measures necessary to preserve or enhance anadromous fisheries.

## *Consistency Discussion*

Alternatives 1 and 2 would include implementation of a Sensitive Area Master Plan for the site. Implementation of the Sensitive Area Master Plan would be intended to result in overall improvements to water quality, fish and wildlife habitat, regional fisheries, wetland functions, and hydrology beyond those that would occur through application of Tukwila's standard Sensitive Areas Ordinance (SAO) provisions (refer to Appendix L for details).

The 498-acre site exceeds the minimum size criterion of 10 acres for designation of a Sensitive Area Master Plan Overlay, which would allow mitigation under a Sensitive Area Master Plan (SAMP). Based on the analysis conducted for this Draft EIS, a net gain in sensitive area functions and values would result from the proposed SAMP, as compared to adherence to the standard SAO provisions. The net gain in environmental benefits would include both onsite and regional habitat benefits. New habitat under the SAMP would include out-migration holding, summer rearing, winter refuge, and upstream migration holding areas. The new Johnson Creek would improve fish passage to the Green River. Over 32 acres of degraded wetlands would be rehabilitated and connected in a habitat corridor through the new Johnson Creek channel to the Green River. This rehabilitation would provide greater enhancement of hydrology, biological, and water quality functions than could be achieved by in-kind mitigation (see Section 3.4, Wetlands, for details).

In contrast, standard SAO provisions would generally involve avoidance of alteration to existing sensitive areas, preservation of existing low-quality buffers, and in-kind mitigation where alteration cannot be avoided. Without development under Alternatives 1 or 2, the expansion of Southcenter Parkway would result in impacts to one ditched stream (Ditch E) onsite. In-kind ditch replacement for impacts to this ditched stream would be implemented; impacts to existing Johnson Ditch (a ditched stream) would be avoided, leaving existing Johnson Ditch in its existing condition.

Consistency with TMC 18.45.160(G) would be as follows: Per TMC 18.45.160(G)(1), the SAMP would provide consistency with the Natural Environment Element of the Tukwila Comprehensive Plan (see City of Tukwila Comprehensive Plan above for further discussion). Consistent with TMC 18.45.160(G)(2), analysis and design decisions for the SAMP relied on best available science for guidance, including scientific information from peer-reviewed and government documents (these documents are referenced in Appendices C, F and E). Consistency with TMC 18.45.160(G)(3), which requires inclusion of mitigation plans meeting or exceeding the requirements of TMC 18.45.090(D) and/or TMC 18.45.110(D), would be achieved (see Appendix L for details). Consistency with TMC 18.45.160(G)(4) is described above and further explained in Appendix L. Per TMC 18.45.160(G)(5), special consideration was given to anadromous fish species in developing the SAMP, and proposed habitat features were designed pursuant to regional salmonid habitat needs. Consistent with TMC 18.45.160(G)(6), all mitigation proposed under the SAMP would be within the site boundaries and within the same watershed boundary as the proposed impacts. Consistent with TMC 18.45.160(G)(7), all mitigation is proposed for the initial infrastructure development stage (within the first two construction seasons). Consistent with TMC 18.45.160(H), this Draft EIS addresses the impacts of development under the SAMP and compares them to impacts that would occur under the standard SAO provisions (see Appendix L).

## City of Tukwila Shoreline Master Plan

This City of Tukwila Shoreline Master Plan (SMP), adopted in 1974, and as amended, was developed in accordance with the State Shoreline Management Act (SMA) of 1971 and with approval by the Department of Ecology. The SMP regulates the use of shorelines within the City of Tukwila, including the Green River shoreline. In compliance with the SMA, the City has established use regulations and a permitting system for issuance of Shoreline Substantial Development Permits for development within 200 feet of the shoreline. The SMP recognizes that shorelines of the State (e.g., the Green River) within Tukwila are located within a major urbanized area, and that pressures for additional use necessitate a coordinated management approach.

Under the SMA, shorelines must be designated as Urban, Rural, Conservancy or Natural based on their character, use, type of development and objectives for the future. All shoreline environments within the City of Tukwila are designated Urban, including the portion of the Green River shoreline adjacent to the site. The objective of the urban environment is to ensure optimum utilization by providing for public use and by managing development so that it enhances and maintains shorelines for a multiplicity of uses. The Urban environment allows high intensity land uses, including residential, commercial and industrial and accessory uses, while providing for restoration and preservation to ensure long-term protection of natural and cultural resources within the shoreline.

When a shoreline area is annexed to a jurisdiction, the SMA requires the jurisdiction to attach a specific shoreline designation to the annexed shoreline, typically under a minor amendment process to the SMP. The procedure for designation requires the City to amend the map portion of its SMP and apply a designation within one year of annexation. Jurisdictions may also “pre-designate” shoreline environments within urban growth areas, prior to annexation (WAC 173-62-150). The designation and map amendment would require approval by the Washington State Department of Ecology. See discussion under State of Washington Plans and Policies – Shoreline Management Act, above.

Tukwila’s SMP is implemented through a Shoreline Overlay Zone per Tukwila Municipal Code (TMC) 18.44, which provides more specific regulations in addition to those of the underlying land use zones to ensure consistency with the SMP. TMC 18.44 divides the area under SMP jurisdiction into three environments: the River environment is a 40-foot-wide zone measured from the mean high water mark; the Low Impact environment consists of the area between 40 and 100 feet from the mean high water mark; and the High Impact environment is the area from 100 to 200 feet from the mean high water mark. Uses in the underlying zone are permitted, provided they are consistent with the additional dimensional and aesthetic requirements of TMC 18.44. TMC 18.44 specifies that: footpaths, recreational facilities such as benches, picnic shelters and viewpoints, pollution control support facilities, information and direction signs, dikes, bridges, fire lanes and plaza connectors between buildings and dikes are allowed in the River environment; uses in the Low Impact environment are limited to those allowed in the River environment and structures not to exceed 35 feet in height, roads, parking, railroad tracks, utilities, and signs; and, all uses allowed in the underlying zone are allowed in the High Impact environment. Maximum allowed structure heights are 15 feet in the River environment and 35 feet in the Low Impact environment. Building height limits in the High Impact environment are defined by the underlying zone. For the onsite High Impact environment, the Tukwila Valley South (TVS) zone currently allows a maximum building height of 115 feet.

### *Consistency Discussion*

Upon annexation of the unincorporated portion of the site to the City of Tukwila, the Green River shoreline within that portion of the site would be designated as Urban under the Tukwila SMP. The shoreline within the unincorporated portion of the site is currently designated Rural under the King County SMP. With annexation of the shoreline to Tukwila, Tukwila's Urban designation and associated SMP regulations would apply to the entire shoreline area within the Tukwila South site.

Portions of development located within the shoreline jurisdiction area would comply with applicable regulations of the Tukwila SMP. Under Alternatives 1 and 2, shoreline permits would be required and would be obtained for new stormwater outfalls and a temporary access road under S 200<sup>th</sup> Street (within the 200-foot shoreline zone); the road is proposed to facilitate transport of material between the north and south portions of the site during the infrastructure development phase, and would be removed following site preparation activities (refer to Chapter 2 and Appendix B for more detail). Specific building development plans have not been formulated for buildout under Alternatives 1 and 2; therefore, no other specific land uses have been identified within the 200-foot shoreline zone. However, it is likely that a portion of the future building and access road components of development would be located within the shoreline zone. New opportunities for public access to the shoreline would be likely, given City Shoreline Master Plan (SMP) regulations. Any future land uses located within the 200-foot shoreline zone would comply with the City's SMP standards regarding uses, height limits, and other applicable regulations.